CLEARY GOTTLIEB STEEN & HAMILTON LLP

ONE LIBERTY PLAZA
NEW YORK, NY 10006-1470
(212) 225-2000
FACSIMILE (212) 225-3999
WWW.CLEARYGOTTLIEB.COM

WASHINGTON, DC • PARIS • BRUSSELS • LONDON
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HONG KONG • BEIJING • BUENOS AIRES • SÃO PAULO

Writer's Direct Dial. +1 212 225 2840 E-Mail. lfriedman@cgsh.com LESLIE B SAMUELS
EVAN A DAVIS
EVAN A DAVIS
LAURENT ALPERT
LAURENT ALPERT
LES SAMUELS
A RICHARD SUSKO
LES LIE N SILVERMAN
ROBERT I TORTORIELLO
A RICHARD SUSKO
LEC C. BUCHHEIT
JAMES M PEASLEE
ALAN L BELLER
THOMAS J MOLONEY
WILLIAM J MOLONEY
WILLIAM J ROLOREY
WILLIAM J ROLOREY
ARON Z REICH
RICHARD S LINCER
JAIME A EL KOURY
STEVEN G HOROWITZ
ANDREA G PODOLSKY
ANDREA G PODOLSKY
JENNEY
STEVEN G HOROWITZ
ANDREA G DOTOLSKY
MICHAEL STEPN
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SHELDON H ALSTER
WANDA J OLSON
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DAVID L SUEGRMAN
MICHAEL R GROLL
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DAVID L SUEGRMAN
MICHAEL R AGOLL
JANIET L FISHER
DAVID L SUEGRMAN
MICHAEL R LAZERWITZ
ARTHUR H KONIN
RYMOND B CHECK

RICHARD J COOPER
JEFFREY S LEWIS
FILLP MOERNAN
FAUL J SHIM
STEVEN L WILNER
ERIKA W NIJENHUIS
LINDSEE P GRANFIELD
ANDRES DE LA CRUZ
DAVIDE LOPER
RICHAR SHIELD
ANDRES DE LA CRUZ
DAVIDE LOPER
MICHAEL A GERSTENZANG
LEWIS J LIMAN
LEV L DASSIN
NEL Q. WIORISKEY
JORGE U JUANTORENA
MICHAEL D WEINBERGER
MICHAEL D WEINBERGER
MICHAEL D DAYAN
ZEFFREY A ROSENTHAL
ETHAN A KLINGSBERG
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SANDRA M ROCKS
S DOIGLAS BORISKY
JUDITH KASSEL
JUDITH KASSEL
DAVID E WEBB
PENELOPE L. CHRISTOPHOROU
BOAZ S MORAG
MARY E ALCOCK
GABRIEL J MERSATON
DAVID H HERRISTITZ
HUGH C. CONGROY JR
KATHLEEN M. EMBERGER
WALLACE L. LARSON, JR
JAMES D SMALL
AVRAME L. LUPT
ELIZABETH LENAS
CARLO DE VITO PISCICELLI
ANDREW WEAVER
HELENA K GRANNIS
GRANT M BINDER
RESIDENT COUNSEL

March 22, 2012

BY HAND

Hon. Dora L. Irizarry, U.S.D.J. United States Courthouse 225 Cadman Plaza East Brooklyn, New York 11201

Re: Weiss v. National Westminster Bank Plc, 05-cv-4622 (DLI) (MDG)

Applebaum v. National Westminster Bank Plc, 07-cv-916 (DLI) (MDG)

Dear Judge Irizarry:

I am enclosing on behalf of defendant National Westminster Bank Plc ("NatWest") a Chambers set of the parties' papers in support of and in opposition to NatWest's motion for summary judgment. In accordance with Your Honor's Individual Rules, Magistrate Judge Go's December 19, 2011 Supplemental Protective Order and Magistrate Judge Go's February 28, 2012 Protective Order, NatWest has filed with the Clerk all of the parties' papers concerning NatWest's motion, both under seal in unredacted form, and publicly in redacted form. Pursuant to the December 19, 2011 Supplemental Protective Order, both parties have indicated with markings in red ink on the enclosed Chambers set of the parties' papers those portions that have been redacted in the publicly filed versions because they contain protected information.

The enclosed documents include the following:

Notice of Motion For Summary Judgment by NatWest;

- Memorandum of Law of NatWest In Support of Its Motion For Summary Judgment;
- NatWest's Statement of Material Facts As To Which There Is No Genuine Issue Pursuant To Local Civil Rule 56.1;
- Declaration of Valerie Schuster In Support of the Motion For Summary Judgment by NatWest and the exhibits thereto, in seven volumes;
- Letter from Stephen Cromie, attaching Statement of Interest on behalf of Her Majesty's Treasury;
- Plaintiffs' Memorandum of Law In Opposition to Defendant's Motion For Summary Judgment;
- Declaration of Joel Israel in Support of Plaintiffs' Opposition to Defendant's Motion For Summary Judgment, and the exhibits 1-173 thereto;
- Plaintiffs' Statement Responding to Defendant's Statement of Material Facts As To Which There Is No Genuine Issue;
- Plaintiffs' Statement of Material Facts As To Which There Is a Genuine Issue To Be Tried Pursuant To Local Rule 56.1(b);
- Reply Memorandum of Law of NatWest In Further Support of Its Motion For Summary Judgment; and
- Reply Declaration of Stephanie D. Sado in Support of the Motion for Summary Judgment by NatWest and the exhibits thereto.
- Index of Papers Submitted By NatWest In Support Of Its Motion For Summary Judgment; and
- Index of Papers Submitted by Plaintiffs In Opposition To Defendant's Motion For Summary Judgment. (These two indexes identify the documents that have been partially or completely redacted in the public filings, in accordance with the Court's prior orders.)

The documents enclosed with this letter are in two boxes. The first box contains documents submitted by NatWest and the second contains those submitted by plaintiffs.

Respectfully,

Lawrence B. Friedman

Enclosures

cc: All counsel of record